

From: [Donald Williams](#)
To: R6_DWH_Info@epa.gov
Subject:
Date: 05/17/2010 08:41 AM
Attachments: [dermalabsorptionno.xls](#)
[dermalabsorptionchild.xls](#)
[inorganicdermalchild.xls](#)
[inorganicdermal.xls](#)
[incidentalingestionno.xls](#)
[distilled_table_of_dispersants_v1.xls](#)
[ATTMG9LL.xls](#)
[ATTAF4NX.xls](#)
[ATTMH6UX.xls](#)
[ATT198GY.xls](#)
[ATTRFERH.xls](#)

Thanks,

Don Williams
Deputy Associate Director
Superfund Remedial Branch
EPA Region 6
(214) 665-2197

----- Forwarded by D= onald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald Williams/R6/USEPA/US
Dipanjana
To: Bhattacharya/R6/USEPA/US@E=PA
Date: 05/14/2010 12:52 PM
Subject: Web Page for list of dispersants

<http://www.epa.gov/emergencies/cont=ent/ncp/product=5Fschedule.htm>

Thanks,

Don Williams
Deputy Associate Director
Superfund Remedial Branch
EPA Region 6
(214) 665-2197

----- Forwarded by D= onald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald Williams/R6/USEPA/US
To: Chris Petersen/R6/USEPA/US@EPA
Date: 05/14/2010 01:40 PM

Subject: Fw: request for oil spill clean
up d= emonstration

Thanks,

Don Williams
Deputy Associate Director
Superfund Remedial Branch
EPA Region 6
(214) 665-2197

----- Forwarded by D= onald Williams/R6/USEPA/US on 05/14/2010 01:40 PM -----

From: "David Fakouri" <dfakou=ri@scgllc.org>
<james.a.watson@uscg.mil>, Sam
Coleman/R6/USEPA/US@EPA,
Donald
To: Williams/R6/USEPA/US@EPA,
<stephen.wague=spack@la.gov>, "'Paul
Rainwater"'<Paul.Rainwater@LA.GOV>,
<agc@agcrowe=.com>
Cc: <stevenosei@msn.com>
Date: 05/14/2010 01:33 PM
Subject: request for oil spill clean up
demon= stration

Dear Admiral Watson,

I received permission to reach out to you by Senator Ag Crowe from Louisiana earlier today for the purpose of arranging an oil clean up demonstration in Robert or an other location to be determin= ed; with yourself and Samuel Coleman of the USEPA as well as our Louisiana Executive Leadership. The purpose is to showcase a naturally safe product that can clean the oil spill and toxic tar balls by breaking the hydrocarbon molecules down ultimately to co2 and water after the application of this product mixed with sea water. Note the tar balls will take longer due to the added chemical presence of dispersants

Simple induction spray application of the o= il spill eater II product mixed with gulf waters be sprayed onto the oil surfa= ce which can over a short time render the

contamination inert and non toxic, where it will then loose its adhesive properties and dissipate naturally as it remains on the waters surface (safe and inert) until it becomes co2 and water.

I have called your office as instructed and found out that you are indeed out where I was referred to LT Commander Funderburg with the Coast Guard.

I am in the process of communicating to him shortly after sending this email to you.

Note I have also reached out for Samuel Coleman who is also out, and I was referred to Don Williams. I will be attempting to contact each in accordance with the instructions of Senator Crowe. I have already emailed our states governor, his executive council and Mr.. Paul Rainwater.

My mission is to deliver to the incident command structure a proven oil spill clean up solution that is EPA-NCP approved. As of yesterday received its second review from the RRT. Presently, the RRT's review of this product has resulted in it being push up to the NRT as of yesterday. Present review/approval Status

unknown with the NRT. Also, the timeline is unknown by us. I have reached out to the main office of the EPA in Dallas for protocol. Presently this product is able to be utilized on shore as it is presently approved for.

The tar balls that have come ashore as of television reports this morning can be treated with this product and naturally be converted to Co2 and Water over time if allowed. We can demonstrate this process to your command structure as well as the oil spill clean up when allowed.

This product is not a new product, but actually an old one that has been in service with all branches of our US Military, and is in present utilization with 30 foreign countries; cleaning up oil and hazardous spills on both land and at sea.

It is my desire to deliver it to the incident command for their review and approval with a demonstration if needed. We hope to deploy the product with its application timely to naturally irradiate oil contamination from our gulf region coastal zone before further irreversible damage is realized in our coastal waters.

Presences of toxic tar balls rolling ashore, also can be remediated with this product in a naturally safe manner like the crude oil, however the tar balls or oil globules will require more time to dissolve due to the presence of corexit 9527 or other dispersants used to form the oil globule.

Please acknowledge me back or have someone let us know when it will be possible to meet with a member of the Coast Guard.

I will be reaching out the EPA and Governors office as well so that such a meeting can occur timely, if at all possible.

Sincerely,
David Fa-Kouri
Strategic Consulting Group

David Fa-Kouri

Fa-Kouri & Associates

BCCI, FCCI, FMC, GIAOO, LEF, SCG

16956b S Harrell's Ferry Rd

Baton Rouge, La 70816

Cell 225 921 9735 800 352 5991 Fax 225 927 6523

Office 225 927 6515 800 281 6441

EMAIL: dfakouri@scgll=c.org

dfakouri@fakourimortgage.com

dfakouri@lousianacollections.com

dfakouri@laeconomicfoundation.com

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From: davidfakouri@gmail.com <= br> **Sent:** Friday, May 14, 2010 12:01 PM
To: Paul Rainwater; stephen.waguespack@la.gov; bobby.jindal@la.gov; A. G. Crowe; Sreve Pedigo; Chris Piehler; kevin@ind-tek.us; David Dysart; David Fakouri
Subject: Fwd: Toxic substance

FYI and request for meeting/demonstration

Of the EPA-ncp approved oil spill bioremediation product which was RRT approved yesterday and is awaiting NRT approval in Washington (oil spill eater II).

Product website. www.Osei.us<= /u>

The proven product is used to treat the toxic oil on the water surface where it will break down the oil naturally back to co2 and water in 30 other countries

When used here after NRT final approval it will

Eliminate the toxins from our coastal zone all the way back to the oil rig site in our gulf waters by spray application when mixed with gulf water

OseII is Utilized by all branches of our us armed forced and 30 other countries to clean up oil spills both on land and sea

Toxic tar balls can be treated as well with the natural product and over time they to will be converted to co2 and water safely.

Not burned of huffed but cleaned up safely

No threat to our ecology

Time is critical

Call me back so we can get started, further show the app= roving authorities the application of the oil spill eater II on the oil slick, like St Bernard parish officials witnessed last Thursday

Stephen, Senator crowe recommended that I call you and arrange something due my requestand the last 11 days of discovery and approvals. He recommended also Others to be present should include rear Adm. James Wats= on and usepa official Samuel Coleman

I await you call or email.

David Fakouri

Fakouri & Associates

Strategic Consulting Group

Fakouri Mortgage

La Economic Foundation

BCCI. _____ FCCI

(225) 927-6515 - office

(225) 927-6523 - fax

(225) 921-9735 - cell

Sent from I phone

= davidfakouri@gmail.com

dfa= kouri@scgllc.org

dfakouri@fakourimortgage.com'

dfakouri@louisianacollections.com

dfakouri@laeconomicfoundation.com' =

Begin forwarded message:

From: "A. G. Crowe" <agc@agcrowe.com>

Date: May 14, 2010 9:12:14 AM CDT

To: David Fakouri <davidfakouri@gmail.com>

Subject: **Re: Toxic substance**

....you certainly can call Steven to set something up and use my name as a reference in that I saw much of the vetting process of the product and that I referred you to the state folks who also went through some tests.....you can call the governor's office and ask for him....also you can call Rear Admiral James Watson at 7573986669 to set a time to meet at the Shell command center in Hammond.....I spoke with him yesterday and we talked about non-toxic solutions.....and lastly, you can talk with Samuel Coleman with the USEPA also in the Shell complex in Hammond, 2146656701.

Please be aware that my primary concern is making sure that if anyone has a non-toxic solution out there, that I will do all I can to get them to the right people to address this clean up process asap.

Thanks,

A.G.

From: David Fakouri <davidfakouri@gmail.com>
To: A. G. Crowe <agc@agcrowe.com>; Sreve Pedigo <stevenosei@msn.com>;
Chris Piehler <chris.piehler@la.gov>; "dfakouri@fakourimortgage. com" <dfak=
ouri@fakourimortgage.com>; kevin@ind-tek.us=
Sent: Fri, May 14, 2010 7:33:12 AM
Subject: Re: Toxic substance

Good morning

What are the chances to have a meeting wi= th
Mr wagenspack and the governor and the co= ast guard and bpwith deq present

Time is running out before oil in the reg= ion causes irreversable damage.
Can we arrange a high level meeting-demon= stration with osell

May 3rd we started this

Today is may 14

This product is the solution for protecti= ng our coastal marches and waters by the
very properties it posseses with it's simple application.

Enough is enough. I am greatly concerned.

AG. You have done great things but tar ba= lls are here

Please get with me
I truely feel that this meeting-demonstra= tion is necessary to end the confusion
and start taking charge with respect cleaning this oil from our coastal zone

David Fakouri

Fakouri & Associates
Strategic Consulting Group
Fakouri Mortgage
La Economic Foundation
BCCI. _____ FCCI

(225) 927-6515 - office
(225) 927-6523 - fax
(225) 921-9735 - cell
Sent from I phone

—
dfak= ouri@scgllc.org
dfakouri@fakourimortgage.com'
dfakouri@louisianacollections.com
dfakouri@laeconomicfoundation.com <= font size=3D3 face=3D"Roman">'

On May 13, 2010, at 9:57 PM, "A. G. Crowe" <agc@agcrowe.com<= /a>> wrote:

[yes](#)

From: David Fakouri <dav= idfakouri@gmail.com>

To: A. G. Crowe <agc@agcrowe.com>

Sent: Thu, May 13, 2010 9:56:16 PM

Subject: Re: Toxic substance

[Thank you. Did you get my email earlier](#)

[David Fakouri](#)

[Fakouri & Associates](#)

[Strategic Consulting Group](#)

[Fakouri Mortgage](#)

[La Economic Foundation](#)

[BCCI.](#) [FCCI](#)

[\(225\) 927-6515 - office](#)

[\(225\) 927-6523 - fax](#)

[\(225\) 921-9735 - cell](#)

[Sent from I phone](#)

[—
dfakouri@scgllc.org<= /u>](#)

[dfakouri@fakourimortgage.com'](#)

[= dfakouri@louisianacollections.com](#)

[= dfakouri@laeconomicfoundation.com'](#)

[On May 13, 2010, at 9:00 PM, "A. G. Crowe" <\[agc@agcrowe.com\]\(mailto:agc@agcrowe.com\)> wrote:](#)

[----- Forwarded Message -----](#)

From: Nicholas Cahanin <Cahaninn@GOV.STATE.LA.US>

To: "agc@agcrowe.co= m" <agc@agcrowe.com>

Sent: Thu, May 13, 2010 5:12:16 PM

Subject: Toxic substance

[See below](#)

From: Frank Collins

To: Nicholas Cahanin

Sent: Thu May 13 17:10:49 2010

Subject:

[DHH, DEQ, LDWF Secretari= es Send Letter to BP outlining concerns, requesting BP Release Information on Dispersants](#)

[BATON ROUGE \(May 8, 2010\) - Secreta= ry Alan Levine of the Louisiana](#)

Department of Health and Hospitals, Louisiana Department of Environmental Quality Secretary Peggy Hatch, and Louisiana Department of Wildlife and Fisheries Secretary Robert Barham sent a letter to British Petroleum today outlining their concerns related to potential dispersant impact on Louisiana's wildlife and fisheries, environment and public health. Officials are also requesting BP release information on the effects of the dispersants they are using to combat the oil spill in the Gulf of Mexico.

The full text of the letter is below.

May 7, 2010

Mr. Tony Hayward
Chief Executive Officer
British Petroleum

Dear Mr. Hayward:

The BP-Transocean drilling incident and resulting oil spill has created massive challenges for BP, the federal government and for the State of Louisiana. We all agree with the primary goal of protecting our sensitive coastal areas and the health and safety of our people. We encourage you to continue making these issues the priority.

As heads of Louisiana's agencies that oversee public health, environmental quality and wildlife and fisheries, including the commercial seafood and oyster industry, we have serious concerns about the lack of information related to the use of dispersants in fighting the oil spill at and below the surface of the Gulf of Mexico, and what, if any, impact the dispersants could have on our people, water and air quality, as well as the wildlife, fisheries and vegetation of Louisiana's coastline and wetlands.

It is important we better understand the science behind the use of these chemicals. Our fishing industry will have much work to do to rebuild its brand when the oil spill is finally contained. We must be able to assure the public of the safety and reliability of our seafood product, and must be able to ensure the viability of wildlife and vegetation along our coast. To do so, we must have a better understanding of the potential impact and consequences of the use of these dispersants. Some specific questions include:

- What are the acute short-term health risks for humans and wildlife in proximity of the areas to which dispersants are being applied, with respect to the mode of delivery and concentrations being used?
- What are the potential long-term effects on humans and wildlife in areas where dispersants are applied?
- What is the expected timeframe for the return of wildlife to pre-event levels?
- What is the effect of dispersants on the oil and how is dispersant-treated oil expected to move through Gulf waters, and what is the expected impact on seafood harvest areas to which the dispersant treated oil may have traveled?

We also have longer-term questions and concerns that need to be addressed:

- What is the half-life of the dispersant chemicals in the marine environment?
- What is BP's plan to monitor the impact of dispersants on the environment,

- people, and wildlife over time?
- What resources will BP make available to restore the wetlands and fisheries that may be harmed by the dispersants?

Three days ago, in a Unified Command Group meeting that included a BP representative, Secretary Barham requested studies to support usage of the dispersants. As of now, the state has not received the requested information. We are again requesting data, analysis and studies of the effects of oil spill dispersants used, and most importantly, a BP commitment that the dispersants being used to fight the oil spill will not cause irreparable, short-term or long-term harm to our wetlands, coast, environment, marine life, wildlife or people. Please submit to us (1) any reports, studies or data either in BP's possession or conducted by BP on the impact of dispersants, and (2) any plans BP has to assist Louisiana in mitigating any negative effects on our environment, health, wildlife and fisheries.

The state is committed to ensuring a long-term solution is put in place to provide the public with confidence in the safety of our products. Our state and seafood industry must have a long-term commitment from BP to establish and sustain an initiative to ensure this is the case.

We look forward to your immediate response.

Sincerely,

Alan Levine

Secretary, Louisiana Department of Health and Hospitals

Peggy Hatch

Secretary, Louisiana Department of Environmental Quality

Robert Barham

Secretary, Louisiana Department of Wildlife and Fisheries

cc: Doug Suttles, COO, BP Global (Robert EOC)

Mike Utsler, Senior VP, BP Alaska Operations (Houma EOC)

Lisa Jackson, Administrator, U.S. Environmental Protection Agency

Thomas Frieden, M.D., M.P.H., Director, U.S. Centers for Disease Control and Prevention

Margaret Hamburg, M.D., Commissioner, U.S. Food and Drug Administration

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----- Forwarded by Donald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald Williams/R6/USEPA/US
To: Janine Dinan/DC/USEPA/US@EPA
Date: 05/14/2010 02:47 PM
Subject: Fw: Dermal Risk Assessment for BP oil spill

[Thanks.](#)

[Don Williams](#)
[Deputy Associate Director](#)
[Superfund Remedial Branch](#)
[EPA Region 6](#)
[\(214\) 665-2197](#)

----- Forwarded by D= onald Williams/R6/USEPA/US on 05/14/2010 02:46 PM -----

From: Jon Rauscher/R6/USEPA/US
To: Donald
Williams/R6/USEPA/US@EPA
Date: 05/14/2010 11:35 AM
Subject: Fw: Dermal Risk Assessment
for BP oil spill

----- Forwarded by J= on Rauscher/R6/USEPA/US on 05/14/2010 11:35 AM -----

From: Jon Rauscher/R6/USEPA/US
To: Mark
Maddaloni/R2/USEPA/US@EPA
Daniel
Stralka/R9/USEPA/US@EPA, Dave
Crawford/DC/USEPA/US@EPA,
Dennis
Santella/R2/USEPA/US@EPA,
Elizabeth Doyle/=
DC/USEPA/US@EPA, John
Schaum/DC/USEPA/US@EPA, Kim
Hoang/R9/USEPA/US@EPA, Pat
Evangelista/R2/=

Cc: USEPA/US@EPA, Matt
Hubner/R6/USEPA/US@EPA,
Laura Hunt/R6/USEPA/US@EPA,
Philip Crocker/R6/=
USEPA/US@EPA, Charlie
Howell/R6/USEPA/US@EPA,
Dipanjana
Bhattacharya/R6/USEPA/US@EPA,
Philip Turner/R6/USEPA/US@EPA,
Cheryl
Overstreet/R6/USEPA/US@EPA

Date: 05/13/2010 12:43 PM

Subject: Re: Dermal Risk Assessment for
BP oil spill

For Hurricane Katrina, Region 6 developed screening tables to evaluate the potential exposure to floodwater. The tables assumed a 3 month exposure period. Separate tables were developed for incidental ingestion and dermal exposure for both adults and children. The 3 month exposure period appears to be appropriate since BP estimate for the relief wells is 3 months. The toxicity values would need to be checked to see if they are still current.

From: Mark Maddaloni/R2/USEPA/US
To: Dave
Crawford/DC/USEPA/US@EPA
Kim Hoang/R9/USEPA/US@EPA,
Daniel Stralka/R9/USEPA/US@EPA,
Elizabeth
Doyle/DC/USEPA/US@EPA,
John
Cc: Schaum/DC/USEPA/US@EPA,
Jon Rauscher/R6/USEPA/US@EPA, Pat
Evangelista/R2/USEPA/US@EPA,
Dennis
Santella/R2/USEPA/US@EPA
Date: 05/13/2010 10:04 AM
Subject: Re: Dermal Risk Assessment for
BP oil spill

I, too, like Kim's approach. A few additional thoughts. When comparing the dermal absorbed dose (DAD) to an oral toxicity criteria, as Kim alluded to, there is a default assumption of 100% oral bioavailability in the critical study. As I recall, there is a rule (aka the Maddaloni rule) that says if the bioavailability in the critical study is >50% then absorbed-to-administered dose adjustment is not necessary - just a blurb in the uncertainty section noting a slight risk underestimate as oral bioavailability is reduced from complete. Dave made a good point re: exposure duration. Hopefully BP will cap the damn well sometime soon - therefore exposure duration is likely to be less than a "chronic" exposure scenario. In the absence of subchronic RfDs for the WTC site, we used a screening value set at an HQ = 3D 10 for subchronic exposures. As Dave also notes, there may be no need to re-invent the wheel if Jon R and company have appropriate spreadsheets from Katrina. A

final thought: one could make the case that OSHA, and not EPA, should have oversight of worker safety and health.

From: = Dave Crawford/DC/USEPA/US
To: &n= bsp: Kim Hoang/R9/USEPA/US@EPA
Cc: &n= bsp: Daniel Stralka/R9/USEPA/US@= EPA, Elizabeth
Doyle/DC/USEPA/US@EPA, John Schaum/DC/USEPA/US@EPA, Mark Maddalon=
i/R2/USEPA/US@EPA
Date: = 05/13/2010 07:37 AM
Subject: &nbs= p: Re: Dermal Risk Assessment for BP oil spill

I've gotten inquiries too, including from Beth Doyle after she talked to Kim. Best I could make out I agreed with everything Beth said that Kim said.

Further developments (I've heard of). They were also considering using the tapwater screening levels from our Regional Screening Levels for Chemical Contaminants at Superfund Sites (RSLs). However, those screening levels include inhalation but not dermal exposures to the water. I agree that dermal should be a principal exposure in assessing contamination in the water being sampled.

Jon Rauscher (R6) advised they have some spreadsheets they used to address water contamination including dermal and inhalation from the Katrina responses. They will see if any toxicity values have changed and may use an updated version of those.

With respect to the RSLs I also noted all of the exposure scenarios are chronic, and we therefore use only chronic toxicity values, but perhaps they should also be considering subchronic exposures. IRIS has no subchronic toxicity values (except one contaminant as I recall), but we have subchronic toxicity values as PPRTVs, ATSDR's MRLs and from HEAST, although I am not sure what is available on the suite of contaminants they will be looking at in the oil.

Dave Crawford
U.S. Environmental Protection Agency
Office of Superfund Remediation and Technology Innovation
telephone: 703-603-8891
email: Crawford.Dave@epa.gov

From: Kim Hoang/R9/USEPA/US
Daniel
Stralka/R9/USEPA/US@EPA,
Mark
To: Maddaloni/R2/USEPA/US@EPA,
John
Schaum/DC/USEPA/US@EPA,
Dave Crawford/DC/US=

EPA/US@EPA
Cc: Elizabeth
Doyle/DC/USEPA/US@EPA
Date: 05/12/2010 02:13 PM
Subject: Dermal Risk Assessment for BP
oil sp= ill

To all:

Beth Doyle from OW/HQ need to do the Dermal RA for the BP oil spill. I advised her to consider 2 scenarios: worker who might come into contact with the water (Risk at 10-4), and residential swimming (risk at 10-6) in case we might need to do some health advisories for the beaches. I pointed her to the Dermal organi= cs spreadsheet and went through it with her and her contractors (Tetrattech, with Herman Gibb as their boss). I also went through the Regional Screening Level web site with her. Since there is no toxicity values associated with the dermal route, I told her to calculate the DAD given the field concentrations of her 60 chemicals (or so) using the Dermal sprea= dsheet, then compared the DAD to the screening level for the oral route at 10-4 and 10-6 level from the RSL web site. Inherent in this approach is an assumption of 100% oral equivalent bioavailability from the Dermal Absor= bed dose. If the risk is high (which I suspect it might be given the concentration, I would recommend at least some level of protective clothing for workers, depending on the activities). I have also advised her to check the OSHA manual on short term exposure and/or dermal toxicity on contact.

Beth would need some help getting the exposure factors for the swimming scenarios, so I pointed her to John and Jackie Moya. I also told her to check with Mark on the bioavailability factor for the tox values.

Beth tried to reach Dan but he was o= ut this week, so I was next on her list.

Please chime in on this approach. &n= bsp: This was the best I could come up with in a short notice. I have a deadline this Friday, so I don't have much time to spend on this project. I will be out of the office for the next 3 weeks, with one week attending NARPM in Crystal City (so I am accessible during that week, locally if need be). I also have my iphone, my number is 408-858-6886, in case you need to reach me while I am out. Email would be best, and I can access webmail easily from my iphone!!!

Thanks,

Kim Hoang, PhD, MPH
Remedial Project Manager
Superfund Division (SFD-7-1)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
(Ph) 415-972-3147

[\(Fax\) 415-947-3526](tel:415-947-3526)

----- Forwarded by Donald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald Williams/R6/USEPA/US
williams.donald@epa.gov,
To: Dipanjana B=
hattacharya/R6/USEPA/US@EPA
Date: 05/14/2010 03:59 PM
Subject: Dispersant Comparisons

[This table may help. It is a comparison of the toxicity and effectiveness of different dispersants on South Louisiana Crude Oil.](#)

Dispersants

Product (1:10 Product-to- No. 2 Fuel Oil ratio)	Toxicity (LC50 values in ppm)			Effectiveness (%)		
	Menidia (96-hr)	Mysidopsis (48-hr)	Prudhoe Bay Crude Oil	South Louisiana Crude Oil	Average of Crude Oils	
	BIODISPERS	5.95	2.66	51.00	63.00	57.00
COREXIT=AE EC9500A	2.61	3.40	45.30	54.70	50.00	
COREXIT=AE EC9527A	4.49	6.60	37.40	63.40	50.40	
DISPERSIT SPC 1000™	7.90	8.20	40.00	100.00	73.00	
FINASOL OSR 52	5.40	2.37	32.50	71.60	52.10	
JD-109	3.84	3.51	26.00	91.00	58.50	
JD-2000™	3.59	2.19	60.40	77.80	69.10	
MARE CLEAN 200	42.00	9.84	63.97	84.14	74.06	
NEOS AB3000	57.00	25.00	19.70	89.80	54.80	
NOKOMIS 3-AA	34.22	20.16	63.20	65.70	64.50	
NOKOMIS 3-F4	100	58.40	62.20	64.90	63.55	
SAF-RON GOLD	9.25	3.04	84.80	53.80	69.30	
SEA BRAT #4	23.00	18.00	53.55	60.65	57.10	
SEACARE ECOSPERSE 52 (see						

FINASOL [®] OSR	5.40	2.37	32.50	71.60	52.10
SEACARE E.P.A. (see DISPERSIT SPC 1000 TM)	7.90	8.20	40.00	100.00	73.00
SF-GOLD DISPERSANT (see SAF-RON GOLD)	9.25	3.04	84.80	53.80	69.30
ZI-400	8.35	1.77	50.10	89.80	69.90
ZI-400 OIL SPILL DISPERSANT (see ZI-400)	8.35	1.77	50.10	89.80	69.90

----- Forwarded by Donald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald Williams/R6/USEPA/US
 To: "David Fakouri" <dfakouri@scgllc.org>
 Date: 05/14/2010 03:53 PM
 Subject: Re: request for oil spill clean up demonstration

TE: May 02, 2010 18:41:51 CST

The ongoing administration-wide response to the Deepwater Horizon oil spill

- Report oiled shoreline or request volunteer information:
(866)-448-5816
- Submit alternative response technology, services or products:
(281) 366-5511
- Submit your vessel as a vessel of opportunity skimming system:
(281) 366-5511
- Submit a claim for damages:
(800) 440-0858
- Report oiled wildlife:
(866) 557-1401

Deepwater Horizon
Incident=
Joint Information Center

Phone: (985) 902-5231
(985) 902-5240

UPDATED May 2, 2010 5 PM

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In the Past 24 Hours:=

- [President Obama visited the Gulf Coast to inspect response operations](#)
coastline of the Gulf states. He was accompanied by Assistant to the President for Homeland Security John Brennan and Assistant to the President for Energy and Climate Change Policy Carol Browner.
- [NOAA is restricting fishing for a minimum of ten days in federal waters most affected by the BP oil spill, largely between Louisiana state waters at the mouth of the Mississippi River to waters off Florida's Pensacola Bay. The closure is effective immediately. This order balances economic and health concerns and only closes those areas affected by oil. Details can be found \[here\]\(#\).](#)
- [BP is now accepting claims for the Gulf Coast oil spill. Please call BP's helpline at 1-800-440-0858. A BP fact sheet with additional information is available \[here\]\(#\). For those who have already pursued the BP claims process and are not satisfied with BP's resolution, can call the Coast Guard at 1-800-280-7118. More information about what types of damages are eligible for compensation under the Oil Pollution Act as well as guidance on procedures to seek that compensation can be found \[here\]\(#\).](#)
- [Secretaries Janet Napolitano and Ken Salazar spoke by conference call to Governors Haley Barbour \(MS\), Bob Riley \(AL\), Rick Perry \(TX\), Charlie Crist \(FL\) and the Deputy Chief of Staff to Gov. Bobby Jindal \(LA\). Gov. Jindal was with President Obama. They briefed the Governors on the ongoing response to the BP oil spill in the gulf. They spoke specifically about efforts to stop the oil leaks and mitigating the oil's impact on the shorelines of their states. Additionally, they spoke about ways to enhance what has been strong cooperation between the federal government and the states. The Secretaries and Governors agreed to speak again on May 4.](#)
- [Response crews continue to test a new technique to break up the oil before it reaches the surface—a remotely operated underwater vehicle dispensing sub-surface dispersant at a rate of nine gallons per minute. BP and NOAA are evaluating the results of the test procedure to determine its feasibility for continued use.](#)
- [EPA last night posted on its \[dedicated response website\]\(#\) the first air monitoring data it's collected in the area—with no red flags at this time.](#)
- [BP has indicated it will reimburse volunteers at the rate of \\$10 per hour. Contractors are also hiring people to support shoreline clean up. Contractor rates go as high as \\$18 per hour for supervisors.](#)

By the Numbers to Date:

- [Personnel were quickly deployed and nearly 2,000 are currently responding to protect the shoreline and wildlife.](#)
- [More than 100 vessels are responding on site, including skimmers, tugs, barges, and recovery vessels to assist in containment and cleanup efforts—in addition to dozens of aircraft, remotely operated vehicles, and multiple](#)

mobile offshore drilling units.

- Hundreds of thousands of feet of boom (barrier) have been deployed to contain the spill—more than 500,000 feet is available.
- More than 1 million gallons of an oil-water mix have been recovered.
- More than 156,000 gallons of dispersant have been deployed—an increase of more than 13,000 gallons since yesterday. An additional 75,000 gallons are available.
- Seven staging areas (Biloxi, Miss., Pensacola, Fla., Venice, La., Pascagoula, Miss. and Theodore, Ala., Port Fourchon, La., and Port Sulphur, La.) were set up to protect sensitive shorelines.
- 2,000 volunteers have been trained to assist in the response effort to date—an increase of 1,400 since yesterday.

Websites and Hotlines:

- For information about the response effort, visit www.deepwaterhorizonresponse.com.
- To volunteer, call 1-866-448-5816.
- To report oiled wildlife, call 1-866-557-1401. Messages will be checked hourly.
- To report spill related damage, please call 1-800-440-0858.
- For information about validated environmental air and water sampling results, visit www.epa.gov/bpspill.
- To file a claim, call BP's helpline at 1-800-440-0858. A BP fact sheet with additional information is available [here](#). For those who have already pursued the BP claims process and are not satisfied with BP's resolution, can call the Coast Guard at 1-800-280-7118. More information about what types of damages are eligible for compensation under the Oil Pollution Act as well as guidance on procedures to seek that compensation can be found [here](#).

Coordinated = Interagency Asset Deployment and Response:

- The Department of Defense is fully integrated into the DHS-led team and fully supportive of all response activities. The Coast Guard and Department of Defense continue to work closely together, anticipating requirements, identifying response options, and rapidly providing response support.
- The Minerals Management Service remains in contact with all oil and gas operators in the sheen area. Two platforms have stopped production and one has been evacuated as a safety measure. Approximately 6.2 million cubic feet of natural gas is shut-in—less than one-tenth of a percent of daily gas production in the Gulf of Mexico.
- As the nation's leading scientific resource for oil spills, NOAA has been on the scene of the BP spill from the start, providing coordinated scientific weather and biological response services to federal, state and local organizations. NOAA spill specialists are advising the U.S. Coast Guard on cleanup options as well as advising all affected federal, state and local partners on sensitive marine resources at risk in this area of the Gulf of Mexico.
- Two Modular Aerial Spray System (MASS) aircraft flew from Stennis International Airport in Mississippi in support of the incident in the Gulf of Mexico. Both aircraft have multiple missions scheduled daily moving forward. These aircraft can dispense the same dispersant chemical being used by BP and the federal responders. Each system is capable of covering up to 250 acres per flight with three flights per aircraft per day.

A C-17 aircraft carrying pollution response boom components for support flew from Travis AFB in California and has arrived at Mobile International Airport.

- In direct support of the Coast Guard under an existing pollution clean-up and salvage operations agreement, the Navy is providing a variety of oil pollution control equipment. The Navy has sent thousands of feet of inflatable oil boom with mooring equipment, several skimming systems, related support gear, and personnel to support oil spill response efforts. Naval Air Station Pensacola is serving as a staging facility for Coast Guard contractor-provided equipment.
- In response to the BP oil spill, the Secretary of Defense has authorized under Title 32 the mobilization of the Louisiana National Guard to help in the ongoing efforts to assist local communities in the cleanup and removal of oil and to protect critical habitats from contamination. As the responsible party in this incident, the government will hold BP accountable for the costs of the deployment.

Spill of National Significance & National Incident Commander:

- Secretary Napolitano announced that this incident is a Spill of National Significance on April 29, the Department of Interior has announced that they will be sending SWAT teams to the Gulf to inspect all platforms and rigs, and the EPA is conducting air monitoring activities to gather information on the impact of the controlled burn on air quality.
- As part of the designation of the BP Oil Spill as a Spill of National Significance, Secretary Napolitano announced that U.S. Coast Guard Commandant Admiral Thad Allen will serve as the National Incident Commander on May 1 for the administration's continued, coordinated response—providing additional authority and oversight in leveraging every available resource to respond to the BP oil spill and minimize the associated environmental risks.
- As National Incident Commander, Admiral Allen will continue to work closely with Coast Guard Rear Admiral Mary Landry, the federal on-scene coordinator, and the Departments of Homeland Security, Defense, Interior and Commerce, the Environmental Protection Agency and other federal departments and agencies as appropriate—as well as BP, the responsible party in the spill—to ensure the efficient continued deployment and coordination of vital response assets, personnel and equipment that were activated immediately after the spill began.

Joint DHS-DOI Investigation:

- Early on, the President directed responding agencies to not only devote every resource to respond to this incident but to also determine its cause.
- Secretary Napolitano and Secretary Salazar signed an order establishing the next steps for a joint investigation that is currently underway into the causes of the explosion of the drilling rig Deepwater Horizon in the Gulf of Mexico. The U.S. Coast Guard (USCG) and the Minerals Management Service (MMS) share jurisdiction for the investigation.
- The joint investigation, which began on April 21, will have the power to issue subpoenas, hold public hearings, call witnesses, and take other steps that may be needed to determine the cause of the incident. It is proceeding under a Joint Statement of Principles and Convening Order, which convenes the formal joint investigation, and a Memorandum of Agreement, which lays out roles and

responsibilities that relate to each agency's area of expertise.

Fishing Restrictions

- NOAA is restricting fishing for a minimum of ten days in federal waters most affected by the BP oil spill, largely between Louisiana state waters at the mouth of the Mississippi River to waters off Florida's Pensacola Bay. The closure is effective immediately. This order balances economic and health concerns and only closes those areas affected by oil. Details can be found [here](#).
- Statement from Harlon Pearce, Chairman, Louisiana Seafood Promotion and Marketing Board: "The precautionary closure of the federal waters off the coast of Louisiana, Mississippi, Alabama and part of Florida is a necessary action to insure the citizens of the United States and abroad that our seafood will maintain the highest level of quality we expect from the Gulf of Mexico. As chairman of the Louisiana Seafood Promotion and Marketing Board, I applaud Dr. Lubchenco's decision to insure everyone that all seafood in the Gulf is of the highest quality and is safe to eat."
- Statement from Ewell Smith, Executive Director, Louisiana Seafood Board: "We Support NOAA's precautionary closure of the affected area so that the American consumer has confidence that the seafood they eat is safe. It is also very important to underscore the fact that this closure is only the affected area of the Gulf of Mexico, not the entire Gulf. The state waters of Louisiana West of the Mississippi River are still open and the seafood coming from that area is safe. That portion of waters represents about 77% of Louisiana seafood production of a 2.4 billion dollar economic impact to the state."

Response Actions:

- The response to the BP Oil Spill began as an emergency search and rescue mission by the U.S. Coast Guard, the Navy and other partners on April 20.
- The President immediately began actively monitoring the incident. The President has been in contact with all the governors of the states that may be affected and ordered that the administration use every single available resource at our disposal.
- Concurrently, command center operations were stood up immediately in the Gulf Coast to begin also addressing the environmental impact of the incident and coordinate with all state and local governments.
- The morning after the explosion, Secretary of the Interior Ken Salazar deployed Deputy Secretary David J. Hayes down to the gulf to assist with coordination and response to the incident.
- When the drill unit sank, the Administration immediately and intensely investigated by remotely operated vehicles the entire 5,000 feet of pipe that's on the floor of the ocean. In that process three leaks were identified, the most recent coming on the evening of April 28.
- The Administration immediately began holding regular calls with BP leadership and numerous senior-level meetings have been held between the administration and BP to discuss BP's response effort and federal oversight and support.
- The National Response Team (NRT), an organization of 16 federal departments and agencies responsible for coordinating emergency preparedness and response to oil and hazardous substance pollution incidents was quickly activated and a coordinated group of federal partners-including the

United States Coast Guard, Departments of Homeland Security, Commerce, Interior and the Environmental Protection Agency-immediately began directing and overseeing BP's response.

- The President dispatched Secretary Napolitano, Secretary Salazar, EPA Administrator Lisa Jackson, Assistant to the President for Energy and Climate Change Policy Carol Browner and NOAA Administrator Jane Lubchenco to the Gulf Coast to ensure all is being done to respond to this oil spill.
- EPA posted on its [dedicated response website](#) the first air monitoring data it's collected in the area—with no red flags at this time.
- President Obama visited the Gulf Coast to inspect response operations

coastline of the Gulf states. He was accompanied by Assistant to the President for Homeland Security John Brennan and Assistant to the President for Energy and Climate Change Policy Carol Browner.

- NOAA is restricting fishing for a minimum of ten days in federal waters most affected by the BP oil spill, largely between Louisiana state waters at the mouth of the Mississippi River to waters off Florida's Pensacola Bay. The closure is effective immediately. This order balances economic and health concerns and only closes those areas affected by oil. Details can be found [here](#).
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- BP has indicated it will reimburse volunteers at the rate of \$10 per hour. Contractors are also hiring people to support shoreline clean up. Contractor rates go as high as \$18 per hour for supervisors.

CONTACT INFORMATION

To report oiled shoreline or request volunteer information: (866)-448-5816

To submit alternative response technology, services or products: (281) 366-5511

To submit your vessel as a vessel of opportunity skimming system: (281) 366-5511

[To submit a claim for damages: \(800\) 440-0858](#)

[To report oiled wildlife: \(866\) 557-1401](#)

[To contact the Deepwater Horizon Joint Information Center: \(985\) 902-5231](#)

[###](#)

[We have been asked to provide this information above as a reference for people interested in the response.](#)

I

From: "David Fakouri" <dfakouri@scgllc.org>
<james.a.watson@uscg.mil>, Sam
Coleman/R6/USEPA/US@EPA,
Donald
To: Williams/R6/USEPA/US@EPA,
<stephen.wague@spack@la.gov>, "Paul
Rainwater"
<Paul.Rainwater@LA.GOV>,
<agc@agcrowe.com>
Cc: <stevenosei@msn.com>
Date: 05/14/2010 01:33 PM
Subject: request for oil spill clean up
demonstration

Dear Admiral Watson,

I received permission to reach out to you by Senator Ag Crowe from Louisiana earlier today for the purpose of arranging an oil clean up demonstration in Robert or an other location to be determined; with yourself and Samuel Coleman of the USEPA as well as our Louisiana Executive Leadership. The purpose is to showcase a naturally safe product that can clean the oil spill and toxic tar balls by breaking the hydrocarbon molecules down ultimately to co2 and water after the application of this product mixed with sea water. Note the tar balls will take longer due to the added chemical presence of dispersants

Simple induction spray application of the oil spill eater II product mixed with gulf waters be sprayed onto the oil surface which can over a short time render the contamination inert and non toxic, where it will then loose its adhesive properties and dissipate naturally as it remains on the waters surface (safe and inert) until it

becomes co2 and water.

I have called your office as instructed and found out that you are indeed out where I was referred to LT Commander Funderburg with the Coast Guard.

I am in the process of communicating to him shortly after sending this email to you.

Note I have also reached out for Samuel Coleman who is also out, and I was referred to Don Williams. I will be attempting to contact each in accordance with the instructions of Senator Crowe. I have already emailed our states governor, his executive council and Mr.. Paul Rainwater.

My mission is to deliver to the incident command structure a proven oil spill clean up solution that is EPA-NCP approved. As of yesterday received its second review from the RRT. Presently, the RRT's review of this product has resulted in it being push up to the NRT as of yesterday. Present review/approval Status

unknown with the NRT. Also, the timeline is unknown by us. I have reached out to the main office of the EPA in Dallas for protocol. Presently this product is able to be utilized on shore as it is presently approved for.

The tar balls that have come ashore as of television reports this morning can be treated with this product and naturally be converted to Co2 and Water over time if allowed. We can demonstrate this process to your command structure as well as the oil spill clean up when allowed.

This product is not a new product, but actually an old one that has been in service with all branches of our US Military, and is in present utilization with 30 foreign countries; cleaning up oil and hazardous spills on both land and at sea.

It is my desire to deliver it to the incident command for their review and approval with a demonstration if needed. We hope to deploy the product with its application timely to naturally irradiate oil contamination from our gulf region coastal zone before further irreversible damage is realized in our coastal waters.

Presences of toxic tar balls rolling ashore, also can be remediated with this product in a naturally safe manner like the crude oil, however the tar balls or oil globules will require more time to dissolve due to the presence of corexit 9527 or other dispersants used to form the oil globule.

Please acknowledge me back or have someone let us know when it will be possible to meet with a member of the Coast Guard.

I will be reaching out the EPA and Governors office as well so that such a meeting can occur timely, if at all possible.

Sincerely,

David Fa-Kouri

Strategic Consulting Group

David Fa-Kouri

Fa-Kouri & Associates

[BCCI, FCCI, FMC, GIAOO, LEF, SCG](#)

[16956b S Harrell's Ferry Rd](#)

[Baton Rouge, La 70816](#)

[Cell 225 921 9735 800 352 5991 Fax 225 927 6523](#)

[Office 225 927 6515 800 281 6441](#)

[EMAIL: \[dfakouri@scgll=c.org\]\(mailto:dfakouri@scgll=c.org\)](#)

[_____ \[dfakouri@fakourimortgage.com\]\(mailto:dfakouri@fakourimortgage.com\)](#)

[_____ \[dfakouri@lousianacollections.com\]\(mailto:dfakouri@lousianacollections.com\)](#)

[_____ \[dfakouri@laeconomicfoundation.com\]\(mailto:dfakouri@laeconomicfoundation.com\)](#)

[This email is not for distribution, publication, or to be used without the expressed consent of David Fakouri inclusive of attachments: Copyright David C. Fa-Kouri, 2009. All rights reserved.](#)

-

From: davidfakouri@gmail.com <=
Sent: Friday, May 14, 2010 12:01 PM
To: [Paul Rainwater](#); stephen.waguespack@la.gov; bobby.jindal@la.gov; [A. G. Crowe](#); [Sreve Pedigo](#); [Chris Piehler](#); kevin@ind-tek.us; [David Dysart](#); [David Fakouri](#)
Subject: [Fwd: Toxic substance](#)

[FYI and request for meeting/demonstration](#)

[Of the EPA-ncp approved oil spill bioremediation product which was RRT approved yesterday and is awaiting NRT approval in Washington \(oil spill eater II\).](#)

[Product website. \[www.Osei.us\]\(http://www.Osei.us\)<= /u>](#)

[The proven product is used to treat the toxic oil on the water surface where it will break down the oil naturally back to co2 and water in 30 other countries](#)

[When used here after NRT final approval it will](#)

[Eliminate the toxins from our coastal zone all the way back to the oil rig site in our gulf waters by spray application when mixed with gulf water](#)

[OseII is Utilized by all branches of our us armed forced and 30 other countries to clean up oil spills both on land and sea](#)

[Toxic tar balls can be treated as well with the natural product and over time they to will be converted to co2 and water safely.](#)

[Not burned of huffed but cleaned up safely](#)

[No threat to our ecology](#)

Time is critical.

Call me back so we can get started, further show the app= roving authorities the application of the oil spill eater II on the oil slick, like St Bernard parish officials witnessed last Thursday.

Stephen, Senator crowe recommended that I call you and arrange something due my requestand the last 11 days of discovery and approvals. He recommended also Others to be present should include rear Adm. James Wats= on and usepa official Samuel Coleman.

I await you call or email.
David Fakouri

Fakouri & Associates
Strategic Consulting Group
Fakouri Mortgage
La Economic Foundation
BCCI. _____ FCCI

(225) 927-6515 - office
(225) 927-6523 - fax
(225) 921-9735 - cell
Sent from I phone
= davidfakouri@gmail.com
dfa= kouri@scgllc.org
dfakouri@fakourimortgage.com'
dfakouri@louisianacollections.com
dfakouri@laeconomicfoundation.com' =

Begin forwarded message:

From: "A. G. Crowe" <agc@agcrowe.com>
Date: May 14, 2010 9:12:14 AM CDT
To: David Fakouri <davidfakouri@gmail.com>
Subject: Re: Toxic substance

....you certainly can call Steven to set something up and use my name as a reference in that I saw much of the vetti= ng process of the product and that I referred you to the state folks who also went through some tests.....you can call the governor's office and ask for him....also you can call Rear Admiral James Watson at 7573986669 to set a time to meet at the Shell command center in Hammond.....I spoke with him yesterday and we taked about non-toxic solutions.....and lastly, you can talk with Samuel Coleman with the USEPA also in the Shell complex in Hammond, 2146656701.

Please be aware that my primary concern is making sure that if anyone has a non-toxic solution out there, that I will do all I can to get them to the right people to address this clean up process asap.

Thanks,
A.G.

From: David Fakouri <davidfakouri@gmail.com>
To: A. G. Crowe <agc@agcrowe.com>; Sreve Pedigo <stevenosei@msn.com>;
Chris Piehler <chris.piehler@la.gov>; "dfakouri@fakourimortgage.com" <dfakouri@fakourimortgage.com>; kevin@ind-tek.us=
Sent: Fri, May 14, 2010 7:33:12 AM
Subject: Re: Toxic substance

Good morning

What are the chances to have a meeting with
Mr wagenspack and the governor and the coast guard and bp with deq present

Time is running out before oil in the region causes irreversible damage.
Can we arrange a high level meeting-demonstration with osell

May 3rd we started this

Today is may 14

This product is the solution for protecting our coastal marches and waters by the
very properties it possesses with its simple application.

Enough is enough. I am greatly concerned.

AG. You have done great things but tar balls are here

Please get with me
I truly feel that this meeting-demonstration is necessary to end the confusion
and start taking charge with respect cleaning this oil from our coastal zone

David Fakouri

Fakouri & Associates
Strategic Consulting Group
Fakouri Mortgage
La Economic Foundation
BCCI. FCCI

(225) 927-6515 - office
(225) 927-6523 - fax
(225) 921-9735 - cell
Sent from I phone

dfakouri@scgllc.org
dfakouri@fakourimortgage.com'
dfakouri@louisianacollections.com
dfakouri@laeconomicfoundation.com <= font size=3D3 face=3D"Roman">'

On May 13, 2010, at 9:57 PM, "A. G. Crowe" <agc@agcrowe.com> wrote:

yes

From: [David Fakouri <dav=idfakouri@gmail.com>](mailto:dav=idfakouri@gmail.com)
To: [A. G. Crowe <agc@agcrowe.com>](mailto:agc@agcrowe.com)
Sent: Thu, May 13, 2010 9:56:16 PM
Subject: [Re: Toxic substance](#)

[Thank you. Did you get my email earlier](#)

[David Fakouri](#)

[Fakouri & Associates](#)
[Strategic Consulting Group](#)
[Fakouri Mortgage](#)
[La Economic Foundation](#)
[BCCI.](#) [FCCI](#)

[\(225\) 927-6515 - office](#)
[\(225\) 927-6523 - fax](#)
[\(225\) 921-9735 - cell](#)
[Sent from I phone](#)

dfakouri@scgllc.org[<= /u>](#)
dfakouri@fakourimortgage.com'
[= dfakouri@louisianacollections.com](mailto:dfakouri@louisianacollections.com)
[= dfakouri@laeconomicfoundation.com](mailto:dfakouri@laeconomicfoundation.com)'

[On May 13, 2010, at 9:00 PM, "A. G. Crowe" <agc@agcrowe.com> wrote:](#)

[----- Forwarded Message -----](#)

From: [Nicholas Cahanin <Cahaninn@GOV.STATE.LA.US>](mailto:Cahaninn@GOV.STATE.LA.US)
To: ["agc@agcrowe.co= m" <agc@agcrowe.com>](mailto:agc@agcrowe.com)
Sent: Thu, May 13, 2010 5:12:16 PM
Subject: [Toxic substance](#)

[See below](#)

From: [Frank Collins](#)
To: [Nicholas Cahanin](#)
Sent: [Thu May 13 17:10:49 2010](#)
Subject:

[DHH, DEQ, LDWF Secretaries Send Letter to BP outlining concerns, requesting BP Release Information on Dispersants](#)

[BATON ROUGE \(May 8, 2010\) - Secretary Alan Levine of the Louisiana Department of Health and Hospitals, Louisiana Department of Environmental Quality Secretary Peggy Hatch, and Louisiana Department of Wildlife and Fisheries Secretary](#)

Robert Barham sent a letter to British Petroleum today outlining their concerns related to potential dispersant impact on Louisiana's wildlife and fisheries, environment and public health. Officials are also requesting BP release information on the effects of the dispersants they are using to combat the oil spill in the Gulf of Mexico.

The full text of the letter is below.

May 7, 2010

Mr. Tony Hayward
Chief Executive Officer
British Petroleum

Dear Mr. Hayward:

The BP-Transocean drilling incident and resulting oil spill has created massive challenges for BP, the federal government and for the State of Louisiana. We all agree with the primary goal of protecting our sensitive coastal areas and the health and safety of our people. We encourage you to continue making these issues the priority.

As heads of Louisiana's agencies that oversee public health, environmental quality and wildlife and fisheries, including the commercial seafood and oyster industry, we have serious concerns about the lack of information related to the use of dispersants in fighting the oil spill at and below the surface of the Gulf of Mexico, and what, if any, impact the dispersants could have on our people, water and air quality, as well as the wildlife, fisheries and vegetation of Louisiana's coastline and wetlands.

It is important we better understand the science behind the use of these chemicals. Our fishing industry will have much work to do to rebuild its brand when the oil spill is finally contained. We must be able to assure the public of the safety and reliability of our seafood product, and must be able to ensure the viability of wildlife and vegetation along our coast. To do so, we must have a better understanding of the potential impact and consequences of the use of these dispersants. Some specific questions include:

- What are the acute short-term health risks for humans and wildlife in proximity of the areas to which dispersants are being applied, with respect to the mode of delivery and concentrations being used?
- What are the potential long-term effects on humans and wildlife in areas where dispersants are applied?
- What is the expected timeframe for the return of wildlife to pre-event levels?
- What is the effect of dispersants on the oil and how is dispersant-treated oil expected to move through Gulf waters, and what is the expected impact on seafood harvest areas to which the dispersant treated oil may have traveled?

We also have longer-term questions and concerns that need to be addressed:

- What is the half-life of the dispersant chemicals in the marine environment?
- What is BP's plan to monitor the impact of dispersants on the environment, people, and wildlife over time?
- What resources will BP make available to restore the wetlands and fisheries

that may be harmed by the dispersants?

Three days ago, in a Unified Command Group meeting that included a BP representative, Secretary Barham requested studies to support usage of the dispersants. As of now, the state has not received the requested information. We are again requesting data, analysis and studies of the effects of oil spill dispersants used, and most importantly, a BP commitment that the dispersants being used to fight the oil spill will not cause irreparable, short-term or long-term harm to our wetlands, coast, environment, marine life, wildlife or people. Please submit to us (1) any reports, studies or data either in BP's possession or conducted by BP on the impact of dispersants, and (2) any plans BP has to assist Louisiana in mitigating any negative effects on our environment, health, wildlife and fisheries.

The state is committed to ensuring a long-term solution is put in place to provide the public with confidence in the safety of our products. Our state and seafood industry must have a long-term commitment from BP to establish and sustain an initiative to ensure this is the case.
We look forward to your immediate response.

Sincerely,

Alan Levine

Secretary, Louisiana Department of Health and Hospitals

Peggy Hatch

Secretary, Louisiana Department of Environmental Quality

Robert Barham

Secretary, Louisiana Department of Wildlife and Fisheries

cc: Doug Suttles, COO, BP Global (Robert EOC)

Mike Utsler, Senior VP, BP Alaska Operations (Houma EOC)

Lisa Jackson, Administrator, U.S. Environmental Protection Agency

Thomas Frieden, M.D., M.P.H., Director, U.S. Centers for Disease Control and Prevention

Margaret Hamburg, M.D., Commissioner, U.S. Food and Drug Administration

###

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----- Forwarded by Donald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald Williams/R6/USEPA/US
To: Donald Williams
<Williams.Donald@epamail.epa.gov>
Date: 05/15/2010 10:34 AM
Subject: Dispersant Schedule Reference=

<http://www.epa.gov/emergencies/docs/oil/ncp/= schedule.pdf>

[Thanks.](#)

[Don Williams](#)
[Deputy Associate Director](#)
[Superfund Remedial Branch](#)
[EPA Region 6](#)
[\(214\) 665-2197](#)

----- Forwarded by Donald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald Williams/R6/USEPA/US
Dipanjana
To: Bhattacharya/R6/USEPA/US@EPA
PA
Date: 05/15/2010 02:43 PM
Subject: Draft Comparison of Approved
Dispersants

[Here is the draft comparison of approved dispersants that Sam asked for. There is no real data on effects to wildlife or aquatic life. However, there is data on toxicity and percent effectiveness, which can be used to compare dispersants to each other.](#)

[Thanks.](#)

[Don Williams](#)
[Deputy Associate Director](#)
[Superfund Remedial Branch](#)
[EPA Region 6](#)
[\(214\) 665-2197](#)

----- Forwarded by Donald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald Williams/R6/USEPA/US
Matt Hubner/R6/USEPA/US@EPA,
Laura Hunt/R6/USEPA/US@EPA, Richard
Mayer/R6/USEPA/US@EPA,
To: Dipanjana
Bhattacharya/R6/USEPA/US@EPA,
Jon

Rauscher/R6/USEPA/US@EPA,
Richard Ehrhart/R6/USEPA/US
Date: 05/17/2010 08:27 AM
Subject: Fw: Development of surface
water and sediment screening
levels for potential human
exposure

[1:00 CST in the fishbowl. I'll send the number when I get it from Glenn.](#)

[Thanks.](#)

[Don Williams](#)
[Deputy Associate Director](#)
[Superfund Remedial Branch](#)
[EPA Region 6](#)
[\(214\) 665-2197](#)

[----- Forwarded by D= onald Williams/R6/USEPA/US on 05/17/2010 08:26 AM -----](#)

From: Glenn Adams/R4/USEPA/US
To: Dave
Crawford/DC/USEPA/US@EPA
Donald
Williams/R6/USEPA/US@EPA,
fdo= lislager@utk.edu,
"Galloway, Leslie D."
<gallowayld@ornl.gov>,
Janine Dinan/D=
C/USEPA/US@EPA, Joseph
Rauscher/DC/USEPA/US@EPA,
Cc: Wilson McGinn
<mcginncw@ornl.gov>,
Michele
Burgess/DC/USEPA/US@EPA,
Ofia
Hodoh/R4/USEPA/US@EPA,
Philip Turner/=R6/USEPA/US@EPA, Elizabeth
Doyle/DC/USEPA/US@EPA
Date: 05/17/2010 08:09 AM
Subject: Re: Fw: Development of
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Thanks,

Glenn

Glenn Adams, Chief
Technical Services Section
Superfund Division
US EPA Region 4
Atlanta, GA
404-562-8771 (office)

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[Dave Crawford](#)

[U.S. Environmental Protection Agency](#)

[Office of Superfund Remediation and Technology Innovation](#)

[telephone: 703-603-8891](#)

[email: Crawford.Dave@epa.gov](#)

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Glenn Adams
<Adams.Glenn@epamail.
Cc: epa.gov>, Joann
Eskelsen/LV/USEPA/US@EPA,
Dave
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Subject: screening levels for potential

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From: Jon Rauscher/R6/USEPA/US
To: Glenn Adams/R4/USEPA/US@EPA
Date: 05/14/2010 01:40 PM
Subject: Fw: Dermal Risk Assessment for BP oil spill

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To: Donald
Williams/R6/USEPA/US@EPA
Date: 05/14/2010 11:35 AM
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To: Mark
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Elizabeth Doyle/=
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Schaum/DC/USEPA/US@EPA, Kim
Hoang/R9/USEPA/US@EPA, Pat
Evangelista/R2/=
Cc: USEPA/US@EPA, Matt
Hubner/R6/USEPA/US@EPA,
Laura Hunt/R6/USEPA/US@EPA,
Philip Crocker/R6/=
USEPA/US@EPA, Charlie
Howell/R6/USEPA/US@EPA,
Dipanjana
Bhattacharya/R6/USEPA/US@EPA,
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Cheryl
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[\[attachment "inorganicdermalchild=.xls" deleted by Glenn Adams/R4/USEPA/US\]](#)
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Cc: John
Schaum/DC/USEPA/US@EPA,
Jon Rauscher/=
R6/USEPA/US@EPA, Pat
Evangelista/R2/USEPA/US@EPA,
Dennis
Santella/R2/USEPA/US@EPA
Date: 05/13/2010 10:04 AM
Subject: Re: Dermal Risk Assessment for
BP oil spill

I, too, like Kim's approach. A few additional thoughts. When comparing the dermal absorbed dose (DAD) to an oral tox criteria, as Kim alluded to, there is a default assumption of 100% oral bioavailability in the critical study. As I recall, there is a rule (aka the Maddaloni rule) that says if the bioavailability in the critical study is >50% then absorbed-to-administered dose adjustment is not necessary - just a blurb in the uncertainty section noting a slight risk underestimate as oral bioavailability is reduced from complete. Dave make a good point re: exposure duration. Hopefully BP will cap the damn well sometime soon - therefore exposure duration is likely to be less than a "chronic" exposure scenario. In the absence of subchronic RfDs for the WTC site, we used a screening value set at an HQ =3D 10 for subchronic exposures. As Dave also notes, there may be no need to re-invent the wheel if Jon R and company have appropriate spreadsheets from Katrina. A final thought: one could make the case that OSHA, and not EPA, should have oversight of worker safety and health.

From: = Dave Crawford/DC/USEPA/US
To: &n= bsp; Kim Hoang/R9/USEPA/US@EPA
Cc: &n= bsp; Daniel Stralka/R9/USEPA/US@= EPA, Elizabeth
Doyle/DC/USEPA/US@EPA, John Schaum/DC/USEPA/US@EPA, Mark Maddalon=

i/R2/USEPA/US@EPA

Date: = 05/13/2010 07:37 AM

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[U.S. Environmental Protection Agency](#)

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[telephone: 703-603-8891](#)

[email: Crawford.Dave@epa.gov](#)

From: Kim Hoang/R9/USEPA/US
Daniel
Stralka/R9/USEPA/US@EPA,
Mark
To: Maddaloni/R2/USEPA/US@EPA,
John
Schaum/DC/USEPA/US@EPA,
Dave Crawford/DC/US=
EPA/US@EPA
Cc: Elizabeth
Doyle/DC/USEPA/US@EPA
Date: 05/12/2010 02:13 PM
Subject: Dermal Risk Assessment for BP
oil sp= ill

To all:

Beth Doyle from OW/HQ need to do the Dermal RA for the BP oil spill. I advised her to consider 2 scenarios: worker who might come into contact with the water (Risk at 10-4), and residential swimming (risk at 10-6) in case we might need to do some health advisories for the beaches. I pointed her to the Dermal organics spreadsheet and went through it with her and her contractors (Tetratex, with Herman Gibb as their boss). I also went through the Regional Screening Level web site with her. Since there is no toxicity values associated with the dermal route, I told her to calculate the DAD given the field concentrations of her 60 chemicals (or so) using the Dermal spreadsheet, then compared the DAD to the screening level for the oral route at 10-4 and 10-6 level from the RSL web site. Inherent in this approach is an assumption of 100% oral equivalent bioavailability from the Dermal Absorbed dose. If the risk is high (which I suspect it might be given the concentration, I would recommend at least some level of protective clothing for workers, depending on the activities). I have also advised her to check the OSHA manual on short term exposure and/or dermal toxicity on contact.

Beth would need some help getting the exposure factors for the swimming scenarios, so I pointed her to John and Jackie Moya. I also told her to check with Mark on the bioavailability factor for the tox values.

Beth tried to reach Dan but he was out this week, so I was next on her list.

Please chime in on this approach. This was the best I could come up with in a short notice. I have a deadline this Friday, so I don't have much time to spend on this project. I will be out of the office for the next 3 weeks, with one week attending NARPM in Crystal City (so I am accessible during that week, locally if need be). I also have my iphone, my number is 408-858-6886, in case you need to reach me while I am out. Email would be best, and I can access webmail easily from my iphone!!!

Thanks,

Kim Hoang, PhD, MPH
Remedial Project Manager
Superfund Division (SFD-7-1)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
(Ph) 415-972-3147
(Fax) 415-947-3526

----- Forwarded by D= onald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald
Williams/R6/USEPA/US

To: Glenn
Adams/R4/USEPA/US@EPA
Dave
Crawford/DC/USEPA/US@EPA,
Eliza= beth
Doyle/DC/USEPA/US@EPA,
fdolislager@utk.edu,
"Galloway, Leslie D."
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Subject: Dermal Risk Assessment for BP
oil sp= ill

To all:

Beth Doyle from OW/HQ need to do the Dermal RA for the BP oil spill. I advised her to consider 2 scenarios: worker who might come into contact with the water (Risk at 10-4), and residential swimming (risk at 10-6) in case we might need to do some health advisories for the beaches. I pointed her to the Dermal organi= cs spreadsheet and went through it with her and her contractors (Tetratex, with Herman Gibb as their boss). I also went through the Regional Screening Level web site with her. Since there is no toxicity values associated with the dermal route, I told her to calculate the DAD given the field concentrations of her 60 chemicals (or so) using the Dermal spre= dsheet, then compared the DAD to the screening level for the oral route at 10-4 and 10-6 level from the RSL web site. Inherent in this approach is an assumption of 100% oral equivalent bioavailability from the Dermal Absor= bed dose. If the risk is high (which I suspect it might be given the concentration, I would recommend at least some level of protective clothing for workers, depending on the activities). I have also advised her to check the OSHA manual on short term exposure and/or dermal toxicity on contact.

Beth would need some help getting the exposure factors for the swimming scenarios, so I pointed her to John and Jackie Moya. I also told her to check with Mark on the bioavailability factor for the tox values.

Beth tried to reach Dan but he was o= ut this week, so I was next on her list.

Please chime in on this approach. &n= bsp;This was the best I could come up with in a short notice. I have a deadline this Friday, so I don't have much time to spend on this project. I will be out of the office for the next 3 weeks, with one week attending NARPM in Crystal City (so I am accessible during that week, locally if need

be). I also have my iphone, my number is 408-858-6886, in case you need to reach me while I am out. Email would be best, and I can access webmail easily from my iphone!!!

Thanks,

Kim Hoang, PhD, MPH
Remedial Project Manager
Superfund Division (SFD-7-1)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
(Ph) 415-972-3147
(Fax) 415-947-3526

----- Forwarded by Donald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald Williams/R6/USEPA/US
To: Maria Martinez/R6/USEPA/US@EPA
Cc: Jon Rauscher/R6/USEPA/US@EPA, Paige Delgado/R6/USEPA/US@EPA,
R6 DWH REOC PSC@EPA, Ruben Casso/R6/USEPA/US@EPA
Date: 05/17/2010 08:30 AM
Re: TO-15 Analytes List

I'll forward this message to Nancy Jones for an answer to your question.

Thanks,

Don Williams
Deputy Associate Director
Superfund Remedial Branch
EPA Region 6
(214) 665-2197

From: Maria Martinez/R6/USEPA/US
To: R6 DWH REOC PSC@EPA
Donald Williams/R6/USEPA/US@EPA, Jon

Cc: Rauscher/R6/USEPA/US@EPA, Paige
Delgado/R6/USEPA/US@EPA, Donald Williams
<Williams.Donald@epamail.epa.gov>, Ruben
Casso/R6/USEPA/US@EPA
Date: 05/16/2010 04:43 PM
Re: TO-15 Analytes List

Don,

Are we talking about the on-going on-shore sampling or the dispersant air sampling?

For the on-going on-shore sampling, that is correct, we are not cutting back the list of analytes for the TO-15. What the Air Committee agreed was that the Regions will review all the speciated VOC data while the data postings were focused on the COCs (BTEX, naphthalene). Additionally, if any speciated VOC besides BTEX and naphthalene busted a screening level, that compound would become a COC if you will.

I imagine we would approach the dispersant air sampling the same way.

I will let you know if the Air Committee discusses an alternate approach. Let me know if you still want to talk. I am out on leave Monday and back in the office on Tuesday.

Maria

From: R6 DWH REOC PSC
Maria
Martinez/R6/USEPA/US@EPA,
Jon
To: Rauscher/R6/USEPA/US@EPA,
Paige
Delgado/R6/USEPA/US@EPA
Donald Williams
Cc: <Williams.Donald@epamail.epa.gov>
Date: 05/16/2010 11:05 AM
Subject: TO-15 Analytes List

Maria,

Nancy Jones called today and asked if we had a specific list of Contaminants of Concern out of the entire list of TO-15 contaminants. BP is tweaking its air monitoring plan and wants to know if EPA had plans to cut back the number of analytes out of the TO-15 list. I told her that we had no plans at this time, but would talk to you tomorrow and get back to her.

Don

----- Forwarded by Donald Williams/R6/USEPA/US on 05/17/2010 08:40 AM -----

From: Donald Williams/R6/USEPA/US
To: Nancy Jones/R6/USEPA/US@EPA
Date: 05/17/2010 08:31 AM
Fw: TO-15 Analytes List

What is the answer to Maria's question about on shore sampling?

Thanks,

Don Williams
Deputy Associate Director
Superfund Remedial Branch
EPA Region 6
(214) 665-2197

----- Forwarded by Donald Williams/R6/USEPA/US on 05/17/2010 08:30 AM -----

From: Maria Martinez/R6/USEPA/US
To: R6 DWH REOC PSC@EPA
Donald Williams/R6/USEPA/US@EPA, Jon Rauscher/R6/USEPA/US@EPA, Paige Delgado/R6/USEPA/US@EPA, Donald Williams
Cc: <Williams.Donald@epamail.epa.gov>, Ruben Casso/R6/USEPA/US@EPA
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From: R6 DWH REOC PSC
Maria
Martinez/R6/USEPA/US@EPA,
To: Jon
Rauscher/R6/USEPA/US@EPA,
Paige
Delgado/R6/USEPA/US@EPA
Donald Williams
Cc: <Williams.Donald@epa.gov>
Date: 05/16/2010 11:05 AM
Subject: TO-15 Analytes List

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Don

----- Forwarded by Donald
Williams/R6/USEPA/US on 05/17/2010
08:40 AM -----

From: Donald Williams/R6/USEPA/US
Dipanjana
Bhattacharya/R6/USEPA/US@EPA, Jon
Rauscher/R6/USEPA/US@EPA,
To: Laura Hunt/R6/USEPA/US@EPA,
Matt Hubner/R6/US@EPA, Richard
Ehrhart/R6/USEPA/US, Richard
Mayer/R6/USEPA/US@EPA
Date: 05/17/2010 08:35 AM
Re: Fw: Development of surface
Subject: water and sediment screening
levels for potential human
exposure

Call in number: 866-299-3188
Access Code: 4045628771#

Thanks,

Don Williams
Deputy Associate Director
Superfund Remedial Branch
EPA Region 6
(214) 665-2197

From: Donald Williams/R6/USEPA/US
Matt Hubner/R6/USEPA/US@EPA,
Laura Hunt/R6/USEPA/US@EPA, Richard
Mayer/R6/USEPA/US@EPA,
To: Dipanjana
Bhattacharya/R6/USEPA/US@EPA,
Jon
Rauscher/R6/USEPA/US@EPA,
Richard Ehrhart/R6/USEPA/US
Date: 05/17/2010 08:27 AM
Fw: Development of surface
water and sediment screening
Subject: levels for potential human
exposure

1:00 CST in the fishbowl. I'll send the
number when I get it from Glenn.

Thanks,

Don Williams
Deputy Associate Director
Superfund Remedial Branch
EPA Region 6
(214) 665-2197

----- Forwarded by Donald
Williams/R6/USEPA/US on 05/17/2010
08:26 AM -----

From: Glenn Adams/R4/USEPA/US
To: Dave
Crawford/DC/USEPA/US@EPA
Donald
Williams/R6/USEPA/US@EPA,
fdo= lislager@utk.edu,
"Galloway, Leslie D."
<gallowayld@ornl.gov>,
Janine Dinan/DC/USEPA/US@EPA, Joseph
Rauscher/DC/USEPA/US@EPA,
Cc: Wilson McGinn
<mcginnw@ornl.gov>,
Michele
Burgess/DC/USEPA/US@EPA,
Ofia
Hodoh/R4/USEPA/US@EPA,
Philip Turner/

R6/USEPA/US@EPA, Elizabeth
Doyle/DC/USEPA/US@EPA

Date: 05/17/2010 08:09 AM

Re: Fw: Development of
Subject: surface water and sediment
screening levels for potential
human exposure

Dave,
As we discussed on the phone, let's do the
call at 2pm (EST). I'll send an invite with a
call in number.<= /font>
Thanks,
Glenn

Glenn Adams, Chief
Technical Services Section
Superfund Division
US EPA Region 4
Atlanta, GA
404-562-8771 (office)

From: Dave
Crawford/DC/USEPA/US
"Galloway, Leslie D." <=
To: gallowayld@ornl.gov>,
fdolislager@utk.edu
Wilson McGinn
<mcginnnw@ornl.gov>= gt;,
Janine
Dinan/DC/USEPA/US@EPA,
Michele
Burgess/DC/USEPA/US@EPA,
Cc: Glenn Adams/=
R4/USEPA/US@EPA, Ofia
Hodoh/R4/USEPA/US@EPA,
Donald
Williams/R6/USEPA/US@EPA,
Joseph Rausche=
r/DC/USEPA/US@EPA, Philip
Turner/R6/USEPA/US@EPA
Date: 05/17/2010 08:34 AM
Fw: Development of surface
Subject: water and sediment
screening levels for potential

human exposure

Leslie, Fred attached is a request for or some quick turnaround assistance for EPA/OEM under our interagency agreement. This work should be done using the OEM funding.

"Under its Inter-Agency Agreement with OSWER/EPA, ORNL shall provide technical support to EPA Regions 4 and 6 in the development of risk-based screening/action levels for recreational exposures to surface water and sediment. ORNL shall provide a table of calculated, recreational screening/action levels for a list of chemicals identified by EPA."

Attached below is a train of emails providing some supplemental information relating to the request from Region 4.

Since things will be happening pretty fast, could we have a short conference call this afternoon (Monday, May 17 1:00 pm EDT?) or perhaps tomorrow morning (Tuesday, May 18, 9:00 am EDT?) to try and make sure we are all on the same sheet of music here, and not duplicating work which has already been done? I do not think we need everyone on the call, but at least one person from OSRTI (me), OEM (Janine or Michele), Region 4, and since Janine's request indicates this work would be used by Region 6 also maybe Jon, Don or Phil.

Issues for clarification:

1. Do you need action levels, screening level, or both, and at what risk levels?
2. Are inhalation exposures to be included? I had heard that Michele was already working on some air screening/action levels, but I do not know the media (air, soil, water).
3. When quantifying dermal exposures to water on Superfund sites we do not recommend that the Part E model water be used for contaminants outside the effective

predictive domain because of excessive uncertainty. I doubt that you want to be bound by that in this exercise. But if you do use the RAGS E water model for contaminants outside the EPD be aware that the outputs are apt to be pretty conservative (e.g. low screening/action levels).

Dave Crawford
U.S. Environmental Protection Agency
Office of Superfund Remediation and
Technology Innovation
telephone: 703-603-8891
email: Crawford.Dave@epa.gov
----- Forwarded by D= ave
Crawford/DC/USEPA/US on 05/17/2010
08:13 AM -----

From: Glenn Adams/R4/USEPA/US
Janine
Dinan/DC/USEPA/US@EPA,
Elizab= eth
Doyle/DC/USEPA/US@EPA,
To: Donald
Williams/R6/USEPA/US@EPA,
"Galloway, Leslie D."
<gallowayld@ornl.gov>, Ofia
Hodoh/R4/USEPA/US@EPA
Glenn Adams
<Adams.Glenn@epamail.=
Cc: epa.gov>, Joann
Eskelsen/LV/USEPA/US@EPA,
Dave
Crawford/DC/USEPA/US@EPA
Date: 05/14/2010 04:02 PM
Fw: Development of surface
water and sediment
Subject: screening levels for potential
human exposure

All,
We have been tasked with developing a screening table that can be used to screen any surface water and/or sediment data based on potential human exposures. What we have already discussed is doing a recreational exposure (90 days) to surface water and to use a 90 day exposure to surface soils because of the

difficulty in determining potential sediment exposure assumptions. (Other suggestions or ideas are welcome.) We would like to use sub-chronic tox values when they are available.

Janine has a contract with ORNL, so we will be using them to actually put the tables together and search out the available sub-chronic tox values. I envision the tables to look like the current Residential Screening Levels (RSLs) table but be clearly noted as site specific tables.

Below is information that Region 6 used in this type effort for Hurricane Katrina that might be helpful.

Don and I are both available at 2pm EST on Monday and I am going to send out an invitation for a conference call. If you can't make it at 2pm, please let me know your availability. I can't do it between 10:30am and 12:30 pm, but can work it out pretty much any other time.

Thanks,
Glenn

Glenn Adams, Chief
Technical Services Section
Superfund Division
US EPA Region 4
Atlanta, GA
404-562-8771 (office)

----- Forwarded by Glenn
Adams/R4/USEPA/US on 05/14/2010 03:47
PM -----

From: Jon
Rauscher/R6/USEPA/US
To: Glenn
Adams/R4/USEPA/US@EPA
Date: 05/14/2010 01:40 PM
Subject: Fw: Dermal Risk
Assessment for BP oil spill

----- Forwarded by Jon on
Rauscher/R6/USEPA/US on 05/14/2010

12:40 PM -----

From: Jon Rauscher/R6/USEPA/US
To: Donald Williams/R6/USEPA/US@EPA
Date: 05/14/2010 11:35 AM
Subject: Fw: Dermal Risk Assessment for BP oil spill

----- Forwarded by J= on
Rauscher/R6/USEPA/US on 05/14/2010
11:35 AM -----

From: Jon Rauscher/R6/USEPA/US
To: Mark Maddaloni/R2/USEPA/US@EPA
Daniel Stralka/R9/USEPA/US@EPA, Dave Crawford/DC/USEPA/US@EPA, Dennis Santella/R2/USEPA/US@EPA, Elizabeth Doyle/=DC/USEPA/US@EPA, John Schaum/DC/USEPA/US@EPA, Kim Hoang/R9/USEPA/US@EPA, Pat Evangelista/R2/=

Cc: USEPA/US@EPA, Matt Hubner/R6/USEPA/US@EPA, Laura Hunt/R6/USEPA/US@EPA, Philip Crocker/R6/=USEPA/US@EPA, Charlie Howell/R6/USEPA/US@EPA, Dipanjana Bhattacharya/R6/USEPA/US@EPA, Philip Turner/R6/USEPA/US@EPA, Cheryl Overstreet/R6/USEPA/US@EPA

Date: 05/13/2010 12:43 PM
Subject: Re: Dermal Risk Assessment for BP oil spill

For Hurricane Katrina, Region 6 developed screening tables to evaluate the potential exposure to floodwater. The tables assumed a 3 month exposure period. Separate tables were developed

for incidental ingestion and dermal exposure for both adults and children. The 3 month exposure period appears to be appropriate since BP estimate for the relief wells is 3 months. The toxicity values would need to be checked to see if they are still current.

[attachment "dermalabsorptionno=.xls"
deleted by Glenn Adams/R4/USEPA/US]
[attachment "dermalabsorptionchild=.xls"
deleted by Glenn Adams/R4/USEPA/US]
[attachment "inorganicdermalchild=.xls"
deleted by Glenn Adams/R4/USEPA/US]
[attachment "inorganicdermal.xls&q=" uot;
deleted by Glenn Adams/R4/USEPA/US]
[attachment "incidental ingestionno=.xls"
deleted by Glenn Adams/R4/USEPA/US]

From: Mark Maddaloni/R2/USEPA/US
To: Dave
Crawford/DC/USEPA/US@EPA
Kim Hoang/R9/USEPA/US@EPA,
Daniel St=
ralka/R9/USEPA/US@EPA,
Elizabeth
Doyle/DC/USEPA/US@EPA,
Cc: John
Schaum/DC/USEPA/US@EPA,
Jon Rauscher/=
R6/USEPA/US@EPA, Pat
Evangelista/R2/USEPA/US@EPA,
Dennis
Santella/R2/USEPA/US@EPA
Date: 05/13/2010 10:04 AM
Subject: Re: Dermal Risk Assessment for
BP oil spill

Subject:

I, too, like Kim's approach. A few additional thoughts. When comparing the dermal absorbed dose (DAD) to an oral toxicity criteria, as Kim alluded to, there is a default assumption of 100% oral bioavailability in the critical study. As I recall, there is a rule (aka the Maddaloni

Subject:

rule) that says if the bioavailability in the critical study is >50% then absorbed-to-administered dose adjustment is not necessary - just a blurb in the uncertainty section noting a slight risk underestimate as oral bioavailability is reduced from complete. Dave make a good point re: exposure duration. Hopefully BP will cap the damn well sometime soon - therefore exposure duration is likely to be less than a "chronic" exposure scenario. In the absence of subchronic RfDs for the WTC site, we used a screening value set at an HQ = 3D 10 for subchronic exposures. As Dave also notes, there may be no need to re-invent the wheel if Jon R and company have appropriate spreadsheets from Katrina. A final thought: one could make the case that OSHA, and not EPA, should have oversight of worker safety and health.

From: = Dave Crawford/DC/USEPA/US

To: &n= bsp; Kim

Hoang/R9/USEPA/US@EPA

Cc: &n= bsp; Daniel

Stralka/R9/USEPA/US@EPA, Elizabeth

Doyle/DC/USEPA/US@EPA, John

Schaum/DC/USEPA/US@EPA, Mark

Maddalon= i/R2/USEPA/US@EPA

Date: = 05/13/2010 07:37 AM

Subject: &nbs= p; Re: Dermal Risk Assessment for BP oil spill

Subject:

I've gotten inquiries too, including from Beth Doyle after she talked to Kim. Best I could make out I agreed with everything Beth said that Kim said.

Further developments (I've heard of). They were also considering using the tapwater screening levels from our Regional Screening Levels for Chemical Contaminants at Superfund Sites (RSLs). However, those screening levels include inhalation but not dermal exposures to the water. I agree that dermal should be a

Subject: principal exposure in assessing
contamination in the water being sampled.

Jon Rauscher (R6) advised they have some spreadsheets they used to address water contamination including dermal and inhalation from the Katrina responses. They will see if any toxicity values have changed and may use an updated version of those.

With respect to the RSLs I also noted all of the exposure scenarios are chronic, and we therefore use only chronic toxicity values, but perhaps they should also be considering subchronic exposures. IRIS has no subchronic toxicity values (except one contaminant as I recall), but we have subchronic toxicity values as PPRTVs, ATSDR's MRLs and from HEAST, although I am not sure what is available on the suite of contaminants they will be looking at in the oil.

Dave Crawford
U.S. Environmental Protection Agency
Office of Superfund Remediation and
Technology Innovation
telephone: 703-603-8891
email: Crawford.Dave@epa.gov

From: Kim Hoang/R9/USEPA/US
Daniel
Stralka/R9/USEPA/US@EPA,
Mark
To: Maddaloni/R2/USEPA/US@EPA,
John
Schaum/DC/USEPA/US@EPA,
Dave Crawford/DC/US=
EPA/US@EPA
Cc: Elizabeth
Doyle/DC/USEPA/US@EPA
Date: 05/12/2010 02:13 PM
Subject: Dermal Risk Assessment for BP
oil sp= ill

To all:

Beth Doyle from OW/HQ need to do the Dermal RA for the BP oil spill. I advised her to consider 2 scenarios: worker who might come into contact with the water (Risk at 10⁻⁴), and residential swimming (risk at 10⁻⁶) in case we might need to do some health advisories for the beaches. I pointed her to the Dermal organics spreadsheet and went through it with her and her contractors (Tetratex, with Herman Gibb as their boss). I also went through the Regional Screening Level web site with her. Since there is no toxicity values associated with the dermal route, I told her to calculate the DAD given the field concentrations of her 60 chemicals (or so) using the Dermal spreadsheet, then compared the DAD to the screening level for the oral route at 10⁻⁴ and 10⁻⁶ level from the RSL web site. Inherent in this approach is an assumption of 100% oral equivalent bioavailability from the Dermal Absorbed dose. If the risk is high (which I suspect it might be given the concentration, I would recommend at least some level of protective clothing for workers, depending on the activities). I have also advised her to check the OSHA manual on short term exposure and/or dermal toxicity on contact.

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and I can access webmail easily from my
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Thanks,

Kim Hoang, PhD, MPH
Remedial Project Manager
Superfund Division (SFD-7-1)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
(Ph) 415-972-3147
(Fax) 415-947-3526

----- Forwarded by Donald
Williams/R6/USEPA/US on 05/17/2010
08:40 AM -----

From: Donald
Williams/R6/USEPA/US
Richard
Mayer/R6/USEPA/US@EPA,
Jon R=
auscher/R6/USEPA/US@EPA,
Laura
To: Hunt/R6/USEPA/US@EPA,
Matt
Hubner/R6/USEPA/US@EPA,
Dipanjana Bhattach=
arya/R6/USEPA/US@EPA,
Richard
Ehrhart/R6/USEPA/US
Date: 05/17/2010 08:38 AM
Fw: Development of surface
water and sediment
Subject: screening levels for potential
human exposure

This is the email from Glenn outlining
the purpose of our call today.

Thanks,

Don Williams
Deputy Associate Director
Superfund Remedial Branch
EPA Region 6
(214) 665-2197

----- Forwarded by Donald
Williams/R6/USEPA/US on 05/17/2010
08:36 AM -----

From: Glenn Adams/R4/USEPA/US
Janine
Dinan/DC/USEPA/US@EPA,
Elizabeth
To: Doyle/DC/USEPA/US@EPA,
Donald
Williams/R6/USEPA/US@EPA,
"Galloway, Leslie D."
<gallowayld@ornl.gov>, Ofia
Hodoh/R4/USEPA/US@EPA
Glenn Adams
<Adams.Glenn@epamail.
Cc: epa.gov>, Joann
Eskelsen/LV/USEPA/US@EPA,
Dave
Crawford/DC/USEPA/US@EPA
Date: 05/14/2010 03:02 PM
Fw: Development of surface
Subject: water and sediment
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human exposure

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Glenn

Glenn Adams, Chief
Technical Services Section
Superfund Division
US EPA Region 4
Atlanta, GA
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Adams/R4/USEPA/US on 05/14/2010 03:47
PM -----

From: Jon
Rauscher/R6/USEPA/US
To: Glenn
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Subject: Fw: Dermal Risk
Assessment for BP oil spill

----- Forwarded by Jon
Rauscher/R6/USEPA/US on 05/14/2010
12:40 PM -----

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To: Donald
Williams/R6/USEPA/US@EPA

Date: 05/14/2010 11:35 AM
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for BP oil spill

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To: Mark
Maddaloni/R2/USEPA/US@EPA
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Stralka/R9/USEPA/US@EPA, Dave
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Elizabeth Doyle/=
DC/USEPA/US@EPA, John
Schaum/DC/USEPA/US@EPA, Kim
Hoang/R9/USEPA/US@EPA, Pat
Evangelista/R2/=
Cc: USEPA/US@EPA, Matt
Hubner/R6/USEPA/US@EPA,
Laura Hunt/R6/USEPA/US@EPA,
Philip Crocker/R6/=
USEPA/US@EPA, Charlie
Howell/R6/USEPA/US@EPA,
Dipanjana
Bhattacharya/R6/USEPA/US@EPA,
Philip Turner/R6/USEPA/US@EPA,
Cheryl
Overstreet/R6/USEPA/US@EPA
Date: 05/13/2010 12:43 PM
Subject: Re: Dermal Risk Assessment for
BP oil spill

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To: Dave
Crawford/DC/USEPA/US@EPA
Kim Hoang/R9/USEPA/US@EPA,
Daniel St=
ralka/R9/USEPA/US@EPA,
Elizabeth
Doyle/DC/USEPA/US@EPA,
Cc: John
Schaum/DC/USEPA/US@EPA,
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Date: 05/13/2010 10:04 AM
Subject: Re: Dermal Risk Assessment for
BP oil spill

I, too, like Kim's approach. A few additional thoughts. When comparing the dermal absorbed dose (DAD) to an oral toxicity criteria, as Kim alluded to, there is a default assumption of 100% oral bioavailability in the critical study. As I recall, there is a rule (aka the Maddaloni rule) that says if the bioavailability in the critical study is >50% then absorbed-to-administered dose adjustment is not necessary - just a blurb in the uncertainty section noting a slight risk underestimate as oral bioavailability is reduced from complete. Dave made a good point re: exposure duration. Hopefully BP will cap the damn well sometime soon - therefore exposure duration is likely to be less than a "chronic" exposure scenario. In the absence of subchronic RfDs for the WTC site, we used a screening value set at an HQ = 3D

10 for subchronic exposures. As Dave also notes, there may be no need to re-invent the wheel if Jon R and company have appropriate spreadsheets from Katrina. A final thought: one could make the case that OSHA, and not EPA, should have oversight of worker safety and health.

From: = Dave Crawford/DC/USEPA/US

To: &n= bsp; Kim
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Cc: &n= bsp; Daniel
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Doyle/DC/USEPA/US@EPA, John
Schaum/DC/USEPA/US@EPA, Mark
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Date: = 05/13/2010 07:37 AM

Subject: &nbs= p; Re: Dermal Risk
Assessment for BP oil spill

I've gotten inquiries too, including from Beth Doyle after she talked to Kim. Best I could make out I agreed with everything Beth said that Kim said.

Further developments (I've heard of). They were also considering using the tapwater screening levels from our Regional Screening Levels for Chemical Contaminants at Superfund Sites (RSLs). However, those screening levels include inhalation but not dermal exposures to the water. I agree that dermal should be a principal exposure in assessing contamination in the water being sampled.

Jon Rauscher (R6) advised they have some spreadsheets they used to address water contamination including dermal and inhalation from the Katrina responses. They will see if any toxicity values have changed and may use an updated version of those.

With respect to the RSLs I also noted all of the exposure scenarios are chronic, and we therefore use only chronic toxicity values, but perhaps they should also be

considering subchronic exposures. IRIS has no subchronic toxicity values (except one contaminant as I recall), but we have subchronic toxicity values as PPRTVs, ATSDR's MRLs and from HEAST, although I am not sure what is available on the suite of contaminants they will be looking at in the oil.

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Date: 05/12/2010 02:13 PM
Subject: Dermal Risk Assessment for BP
oil sp= ill

To all:

Beth Doyle from OW/HQ need to do the Dermal RA for the BP oil spill. I advised her to consider 2 scenarios: worker who might come into contact with the water (Risk at 10⁻⁴), and residential swimming (risk at 10⁻⁶) in case we might need to do some health advisories for the beaches. I pointed her to the Dermal organi= cs spreadsheet and went through it with her and her contractors (Tetrattech, with Herman Gibb as their boss). I also went through the Regional Screening Level web site with her. Since there is no toxicity

values associated with the dermal route, I told her to calculate the DAD given the field concentrations of her 60 chemicals (or so) using the Dermal spreadsheet, then compared the DAD to the screening level for the oral route at 10^{-4} and 10^{-6} level from the RSL web site. Inherent in this approach is an assumption of 100% oral equivalent bioavailability from the Dermal Absorbed dose. If the risk is high (which I suspect it might be given the concentration, I would recommend at least some level of protective clothing for workers, depending on the activities). I have also advised her to check the OSHA manual on short term exposure and/or dermal toxicity on contact.

Beth would need some help getting the exposure factors for the swimming scenarios, so I pointed her to John and Jackie Moya. I also told her to check with Mark on the bioavailability factor for the tox values.

Beth tried to reach Dan but he was out this week, so I was next on her list.

Please chime in on this approach. This was the best I could come up with in a short notice. I have a deadline this Friday, so I don't have much time to spend on this project. I will be out of the office for the next 3 weeks, with one week attending NARPM in Crystal City (so I am accessible during that week, locally if need be). I also have my iphone, my number is 408-858-6886, in case you need to reach me while I am out. Email would be best, and I can access webmail easily from my iphone!!!

Thanks,

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